

1 David J. McGlothlin (SBN 026059)  
2 david@kazlg.com  
3 Ryan L. McBride (SBN 032001)  
4 ryan@kazlg.com  
5 **Kazerouni Law Group, APC**  
6 301 E. Bethany Home Road, Suite C-195  
7 Phoenix, AZ 85012  
8 Telephone: (800) 400-6808  
9 Facsimile: (800) 520-5523

10 Jacob U. Ginsburg, Esq. (phv)  
11 **KIMMEL & SILVERMAN, PC**  
12 30 E. Butler Avenue  
13 Ambler, PA 19002  
14 Tel: (267) 468-5374  
15 Fax: 215-540-8817  
16 jginsburg@creditlaw.com  
17 teamkimmel@creditlaw.com  
18 *Attorneys for Plaintiff*

19  
20 **UNITED STATES DISTRICT COURT**  
21 **FOR THE DISTRICT OF ARIZONA**

22  
23 Kimberly Starling, individually and on  
24 behalf of others similarly situated

25 Plaintiff,

26 Case No. 2:23-cv-00014-SMB

27 v.

28 W Streets LLC and Next Level  
Mastermind LLC,

**PLAINTIFF'S REQUEST FOR  
ENTRY OF DEFAULT**

Defendants.

29  
30 TO THE CLERK OF COURT:

31 Plaintiff, Kimberly Starling ("Plaintiff"), by and through her undersigned  
32 counsel, hereby requests for entry of default against Defendant, W Streets, LLC ("W  
33 Streets").



1 W Streets was served via the Texas Secretary of State on April 24th , 2023. See  
2 Docket Entry 11. Accordingly, W Streets' answer would have been due May 15th,  
3 2023. As of this date, no answer has been filed by W Streets.

4 For those reasons and those set forth in the accompanying Affidavit, Plaintiff  
5 requests the Clerk enter default against Defendant W Streets LLC, pursuant to Fed. R.  
6 Civ. P. 55(a).

7  
8 Respectfully submitted,

9  
10 */s/ Jacob U. Ginsburg*  
11 Jacob U. Ginsburg, Esq. (phv)  
12 **KIMMEL & SILVERMAN, PC**  
13 30 E. Butler Avenue  
14 Ambler, PA 19002  
15 Tel: (267) 468-5374  
16 Fax: 215-540-8817  
17 [jginsburg@creditlaw.com](mailto:jginsburg@creditlaw.com)  
18 [teamkimmel@creditlaw.com](mailto:teamkimmel@creditlaw.com)  
19 *Attorneys for Plaintiff*

20  
21 Dated: June 13, 2023



## CERTIFICATE OF SERVICE

I, Jacob U. Ginsburg, Esquire, do certify that I served a true and correct copy of the foregoing motion in the above-captioned matter, upon all parties of record via ECF and the following via standard mail on June 13, 2023:

W Streets LLC  
C/o Jamie Leann Wooley  
(Registered Agent for Service of Process)  
111 Hunters Glen Drive  
Wylie, TX 75098

*/s/ Jacob U. Ginsburg*